

December 4, 2018

Mr. Mike Stoker
Regional Administrator
U.S. Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, California 94105

Dear Mr. Stoker:

The California Air Resources Board (CARB or Board) is submitting the *California Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities* (Oil and Gas Methane Regulation) adopted in 2017 (California Code of Regulations Title 17, sections 95665 to 95677) to the U.S. Environmental Protection Agency (U.S. EPA) as a revision to the California State Implementation Plan (SIP). The Oil and Gas Methane Regulation establishes methane emission standards for crude oil and natural gas facilities in furtherance of the California Global Warming Solution Act.

U.S. EPA requires the submission of SIPs for nonattainment areas classified as moderate or above to demonstrate that sources meet Reasonable Available Control Technology (RACT) level controls. U.S. EPA publishes Control Techniques Guidelines (CTG) that establish RACT control limits for specific categories of sources that emit volatile organic compounds, including the 2016 *CTG for the Oil and Natural Gas Industry*. CARB is submitting the Oil and Gas Methane Regulation to satisfy these RACT requirements. The California Oil and Gas Methane Regulation applies to all emission sources covered in the CTG, and in combination with local air district rules where applicable, achieves equivalent emission reductions for each source category to the RACT level controls required in ozone nonattainment areas classified moderate or above.

This SIP submittal consists of the following enclosed documents:

- 1) CARB SIP Completeness Checklist.
- 2) Staff Report: *Proposed Submission of California's Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities into the California State Implementation Plan.*
- 3) CARB Resolution 18-44 directing CARB staff to submit the Oil and Gas Methane Regulation as a revision to the California SIP.

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- 4) Public notice evidence and transcript for the CARB October 25, 2018 public meeting to consider approval to direct CARB staff to submit the Oil and Gas Methane Regulation as a revision to the California SIP.
- 5) Board Meeting Comments Log and written comments regarding Oil and Gas Methane Regulation SIP submittal.
- 6) Regulatory documentation for California Code of Regulation sections 95665 to 95677.

If you have any questions, please contact Mr. Kurt Karperos, Deputy Executive Officer, at (916) 322-2739, or have your staff contact Dr. Michael Benjamin, Chief, Air Quality Planning and Science Division, at (916) 201-8968.

Sincerely,



Richard W. Corey
Executive Officer

Enclosures

cc: Mr. Kurt Karperos
Deputy Executive Officer
California Air Resources Board

Dr. Michael Benjamin, Chief
Air Quality Planning and Science Division
California Air Resources Board